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*Attorneys for Defendants
Sagent Pharmaceuticals, Inc. and
ACS Dobfar Info S.A.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

ACTAVIS LLC; APOTEX, INC.; APOTEX,
CORP.; BEDFORD LABORATORIES; DR.
REDDY'S LABORATORIES LTD.; EMCURE
PHARMACEUTICALS USA, INC.; EMCURE
PHARMACEUTICS, LTD.; HOSPIRA, INC.;
PHARMACEUTICS INTERNATIONAL INC.;
PHARMAFORCE, INC.; SAGENT
PHARMACEUTICALS, INC.; ACS DOBFAR
INFO S.A.; STRIDES, INC.; AGILA
SPECIALTIES PRIVATE LTD.; SUN
PHARMACEUTICALS INDUSTRIES, INC.;
SUN PHARMA GLOBAL FZE; CARACO
PHARMACEUTICAL LABORATORIES,
LTD.; SUN PHARMACEUTICAL
INDUSTRIES LTD.; TEVA PARENTERAL
MEDICINES, INC.; WOCKHARDT USA LLC;
and WOCKHARDT LTD.,

Defendants.

DECLARATION OF VICTORIA A.
WOHLFEIL, ESQ. IN OPPOSITION TO
NOVARTIS' MOTION FOR A
TEMPORARY RESTRAINING ORDER
AND A PRELIMINARY INJUNCTION

PUBLIC VERSION

Civ. Action No. 13-1028 (SDW) (MCA)

(Filed Electronically)

I, Victoria A. Wohlfeil, Esq., declare as follows:

1. I am Corporate Counsel for Sagent Pharmaceuticals, Inc. ("Sagent"), a defendant in the captioned litigation.

2. I have personal knowledge of the facts set forth in this Declaration.

3. REDACTED
REDACTED REDACTED

This net profit
can be used to determine the amount of any bond to be posted by plaintiff Novartis Pharmaceuticals Corporation ("Novartis") if Sagent is enjoined from selling its generic Zometa and/or Reclast products.

4. REDACTED
REDACTED
REDACTED But for any
injunctive relief that this Court may order, Sagent will be able to market its generic version of Zometa upon receipt of final approval from FDA.

5. As set forth in the accompanying Declaration of Thomas Moutvic, Vice President of Sagent's Regulatory Affairs, REDACTED
REDACTED Here too, but for
any injunctive relief that this Court may order, Sagent will be able to market its generic version of Reclast upon receipt of final approval from FDA.

6. REDACTED
REDACTED

REDACTED

7.

REDACTED

REDACTED

Consequently,

Sagent has not yet promoted such products.

8.

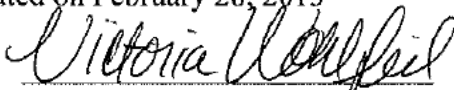
REDACTED

REDACTED

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 28, 2013

By:


Victoria A. Wohlfeil, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2013, I caused this DECLARATION OF VICTORIA A. WOHLFEIL, ESQ. IN OPPOSITION TO NOVARTIS' MOTION FOR A TEMPORARY RESTRAINING ORDER AND A PRELIMINARY INJUNCTION to be filed under seal with the Court and served upon all counsel of record via ECF and by email to all counsel of record on a "Confidential Outside Attorneys' Eyes Only" basis.

s/ Marilyn Neiman
Marilyn Neiman